

**CARR TELEPHONE COMPANY
4325 S. MASTEN ROAD . P.O. BOX 100
BRANCH, MI 49402
231.898.2244 FAX 231.898.3900**

February 5, 2008

**Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554**

**RE: Certification of CPNI Filing February 5, 2008: EB-06-TC-060
For the 2007 Filing Year**

Ms. Dortch:

**Enclosed for filing is a Certification of Compliance with Protection of
Customer Propriety Network Information Rules, which is being filed in
accordance with the Commission's January 30, 2006 Public Notice,
DA 06-223.**

Sincerely,


**Teresa Bogner, Secretary
Carr Telephone Company**

**cc: Federal Communications Division, Enforcement Bureau
Best Copy and Printing, Inc.**

Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 5, 2008

Name of Company: Carr Telephone Company

Form 499 Filer ID: 803700

Signatory: Teresa Bogner

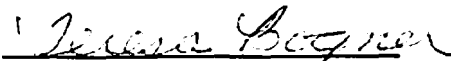
Title: Secretary

I, Teresa Bogner, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has taken any actions (proceedings instituted or petitions filed by a Company at either state Commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).



Teresa Bogner, Secretary

**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF
CUSTOMER
PROPRIETY NETWORK INFORMATION RULES
FOR 2007 FILING YEAR**

Teresa Bogner signs this Certificate of Compliance in accordance with 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Carr Telephone Company (Company). This certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR 64.2001-2009.

On behalf of the Company, I certify as follows:

- 1. I am an officer of the Company. My business address is 4325 S. Masten Road, Branch, MI 49402.**
- 2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).**
- 3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high level management to ensure that use of CPNI is made until a full review of applicable law has occurred.**
- 4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Mitchel Bogner, The Company's President. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.**
- 5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services**

that was offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

6. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all the rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Mitchel Bogner regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either I or Mitchel Bogner consult the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either Mitchel Bogner or I regarding any proposed use of CPNI.

7. Further, both Mitchel Bogner and I personally oversee the use of opt-in or opt-out or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI, contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.

8. Mitchel Bogner and I also ensure that the Company enters into confidentiality agreements, as necessary with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

9. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

February 5, 2008



Teresa Bogner, Secretary